

FILED
In the District Court of the United States
For the District of Massachusetts
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2006 JUN -1 P 1:12

The United States of America,

plaintiff,

vs.

Nadine J. Griffin

defendant.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Case number 05-CR-10175-WGY

Nadine J. Griffin, continuing to proceed in special appearance, objects to the presentment of electronic video recordings in which Nadine J. Griffin alleges to testify regarding personal finances and moves this court in limine for the exclusion of the video recordings which lack probative value and are prejudicial to the rights of Nadine J. Griffin

Grounds for objection

Video recordings purporting to show Nadine J. Griffin's financial success relative to the organization Global Prosperity are lacking in a competent fact witness who can testify under oath and subject to cross-examination relative to the meaning and foundation of comments made, on video, by Nadine J. Griffin. Only Nadine J. Griffin has personal knowledge of the truth of the comments allegedly made by Nadine J. Griffin. Nadine J. Griffin cannot be compelled to testify regarding the video recordings.

Brief in support of motion in limine

Commentaries made regarding investments are governed by the *parol evidence rule*. Without accompanying materials in writing which corroborate what Nadine Griffin alleged said, the video recording of Nadine J. Griffin lacks relevance.

Regardless, video recordings purporting to show Nadine J. Griffin making a sales presentation regarding Global Prosperity, without corroborative evidence, lack probative value and disserve the cause of justice by posing only prejudice to the rights of Nadine J. Griffin.

Conclusion

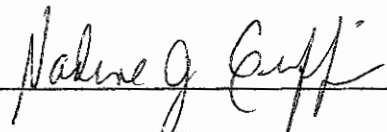
Whereas this court has actual knowledge that only Nadine J. Griffin has actual knowledge of the facts relating to video recordings purporting to show Nadine J. Griffin making a sales presentation regarding Global Prosperity; and whereas, this court has actual knowledge that Nadine J. Griffin cannot be compelled to take the stand and testify regarding the factual merit of the representations of Nadine J. Griffin contained in the videos; and whereas this court has actual knowledge that video sales presentations are violative of the parol evidence rule; and whereas, this court has actual knowledge that video recordings purporting to show Nadine J. Griffin making a presentation regarding Global Prosperity lacks probative value and serves only to prejudice the rights of Nadine J. Griffin, this could should prohibit the use of any video recordings during trial.

Prepared and submitted by:


Nadine J. Griffin

Certificate of mailing

I, Nadine J. Griffin, certify that May 20, 2006, I mailed a true and correct copy of the above and foregoing motion to continue to: Christopher Maietta, at


Nadine J. Griffin